



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
ALLISON REESE
Nevada Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: allison.reese@usdoj.gov
Attorneys for the United States of America

FILED
U.S. MAGISTRATE JUDGE

DATE: October 3, 2022

TIME: 9:20 a.m.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASON EDWARD ROON,

Defendant.

Case No.: 2:22-mj-00768-EJY

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Jason M. Frierson, United States Attorney, and Allison Reese, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of Title 21, United States Code, Sections 841 and 846—Distribution of a Controlled Substance and Conspiracy to Distribute a Controlled Substance that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is reason

1 to believe that the disclosure of the information contained within the Complaint will jeopardize
2 the investigation, including by giving the targets an opportunity to flee or continue flight from
3 prosecution or change patterns of behavior.

4 The Government further submits that it is necessary for the Complaint to be sealed in light
5 of the fact that the targets of this investigation utilize digital devices to conduct their illegal
6 activities. If the targets became aware of the investigation, they could delete and destroy evidence,
7 including but not limited to text messages, photographs, and social media account information
8 or messages received and sent over those platforms. Accordingly, there is reason to believe that
9 notification of the existence of complaint will seriously jeopardize the investigation, as noted
10 previously, and would likely place law enforcement at higher risk of confrontation when securing
11 the arrest of the targets.

12 DATED: October 3, 2022

13 Respectfully submitted,

14 JASON M. FRIERSON
United States Attorney

15 *Allison Reese*

16 ALLISON REESE
17 Assistant United States Attorney
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ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor,
IT IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 3rd day of October, 2022.


HONORABLE ELENA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE